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July 12, 2018

VIA E.C.F.

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court – Southern District of New York
40 Foley Square
New York, New York 10007

Re: Breuer v. Castaneda
Case No.: 15-CV-05060 (VSB)

Honorable Judge Broderick:

This firm represents the Plaintiff in this action. Please allow this letter to update to Your Honor as to the status of discovery per the Court's Order of June 29, 2018.

Since the previous update, Plaintiff served a Second Demand for Interrogatories which was sent to Defendant on March 14, 2018 which is still outstanding. Following production of same, Plaintiff seeks to depose Defendant. It is unknown how long these items would take as the response to the Second Demand for Interrogatories lies with the Defendant and we would thereafter make diligent efforts to conduct Defendant's deposition.

On July 9, 2018, I emailed Defendant regarding the Court's Order and Defendant responded that he believed that the New York Legal Assistance Group which appeared for Defendant in connection with the settlement conference(s) sent us back in May the second set responses though we advised that we did not receive a response to same and he further indicated that he intended on letting us know what is outstanding from his perspective after his call with the New York Legal Assistance Group. We have not received any further communication from Defendant.

I write this letter early in the morning of July 12, 2018 as I will be traveling out of state for the weekend, leaving this afternoon and would not be able to submit this letter or engage with Defendant later today or tomorrow.

Please allow the foregoing to update the Court. If Your Honor has any questions, I would be happy to answer them. We will update the Court as developments arise. If the Court wants to schedule a conference call with Defendant (as done in the past), we would be happy to arrange same accordingly.

Respectfully Submitted,

Jason J. Rebhun

CC: Robert Castaneda (by email only)